

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

Rodney Alexander, Lillian D. Clayton,
Tineno Ferguson, Darrian Ford Sr.,
Ann Gardner, Margaret Garey, Deborah Graham,
Mariedth Greathouse, Brenda Harmon, Pearly Harris,
Lavada Hollins, Willie Hoyle, Kim Isom, Areatha
Murphy, Aaron Rolling, Sarah Smith, David Weir,

Plaintiffs,
vs.

Case No: **4:06-CV-0129**
Hon. Paul L. Maloney

ATLANTIC AUTOMOTIVE COMPONENTS and
VISTEON CORPORATION,

Defendants.

/

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE EXHIBITS
6, 7, 8 & 9 TO PLAINTIFFS' BRIEF IN RESPONSE TO DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT (Dkt 120)**

Plaintiffs' Electronic Filing of documents in Response to Defendants' Motion for Summary Judgment (Dkt 120) started on May 9, 2008 at approximately 2:30 p.m. and continued for next approximate 11 ½ hours. At approximately 1:30 a.m. the morning of May 10, 2008 Plaintiffs' attorney encountered difficulty in filing general Exhibits 6, 7, 8 and 9 to Plaintiffs' Brief in Response to Defendants' Motion for Summary Judgment as the Court's server would not accept the pdf formatted documents indicating through a

pop up window that there was data encrypted within the exhibits preventing the court's server from accepting them. Consequently, Plaintiffs' counsel bypassed the four exhibits and proceeded to file the remaining exhibits. These four exhibits otherwise would have been filed as part of the exhibits comprising docket entry 175.

Exhibits 6, 7, 8 and 9 have been reformatted by Team Legal Solutions in order to eliminate the encryption problem and are attached to this Motion.

Exhibits 6, 7, 8, and 9 are spreadsheets prepared by Team Legal Solutions and are taken from the Master Blue Cross Blue Shield of Michigan ("BCBSM") spreadsheet, Ex. 2. They reflect the paid medical claims for the identified groups of employees listed below (including spouse and dependents) for the years 2001-2004 and provide a dollar total for the four years (of coverage or for a lesser number of years as the case may be) and are intended to be useful in identifying the specific paid medical claims for the relevant groups without the need for searching through the entire BCBSM spreadsheet.

Exhibit 6 – Plaintiff Group.

Exhibit 7 – Group of 16 reinstated employees.

Exhibit 8 – Group of 25 offered conditional reinstatement.

Exhibit 9 - Group of 3 offered reinstatement May 2005.

Despite request, Counsel for Defendants' has not stipulated to the filing of these exhibits, therefore it is necessary to file this motion.

WHEREFORE, your Plaintiffs request this Honorable Court enter an Order granting them leave to file Exhibits 6, 7, 8 and 9, and include them with the Exhibits Plaintiffs have filed in support of Plaintiffs' Response to Defendants' Motion for Summary Judgment (Dkt 120).

Dated: May 13, 2007

Sandmeyer & Minka, PLC

/s/ _____
Imants M. Minka (P29211)
Attorney for Plaintiffs